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CONTOS & BUNCH
LAWYERS
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SUITE 400
WOODLAND HILLS, CALIFORNIA 91367-4694
(818) 716-9400

Attorneys for Defendant and Cross-Complainant,
GERALD ARMSTRONG

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF CALIFORNIA,)	NO. C420153 (Severed Action)
)	
Plaintiff,)	OBJECTIONS OF CROSS-COMPLAINANT,
)	GERALD ARMSTRONG, TO
vs.)	INTERROGATORIES PROPOUNDED BY
)	CROSS-DEFENDANT, CHURCH OF
GERALD ARMSTRONG,)	SCIENTOLOGY OF CALIFORNIA
)	
Defendant.)	
)	

COMES NOW cross-defendant, GERALD ARMSTRONG, and submits the following objections to interrogatories propounded by cross-defendant and served on October 2, 1986.

31. Objection, said interrogatory is improper in that the appropriate method of obtaining the identity of expert witnesses is pursuant to C.C.P. §2037.

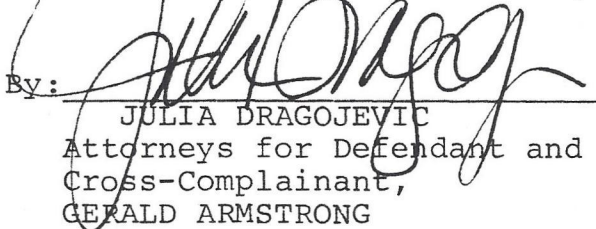
33. Objection, cross-complainant is unable to respond to this interrogatory because cross-defendant has failed to produce documents necessary to refresh

///
///
///

1 cross-complainant's memory.

2 DATED: November 17, 1986

3 CONTOS & BUNCH

4
5 By: 
6 JULIA DRAGOJEVIC
7 Attorneys for Defendant and
8 Cross-Complainant,
9 GERALD ARMSTRONG

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VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing

and know its contents.

CHECK APPLICABLE PARAGRAPH

- I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true. I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

- I am one of the attorneys for, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on, 19, at California. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Type or Print Name

Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT

(other than summons and complaint)

Received copy of document described as

on 19.

Type or Print Name

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of LOS ANGELES, State of California.

I am over the age of 18 and not a party to the within action; my business address is: 5855 Topanga Canyon Blvd., Ste. 400, Woodland Hills CA 91367

On Nov. 17 1986, I served the foregoing document described as OBJECTIONS OF CROSS-DEFENDANT, GERALD ARMSTRONG, TO INTERROGATORIES PROPOUNDED BY CROSS-DEFENDANT, CHURCH OF SCIENTOLOGY OF CALIFORNIA

on the parties

in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

John G. Peterson, Esq. PETERSON & BRYNAN 8530 Wilshire Blvd. #407 Beverly Hills CA 90211

Donald C. Randolph, Esq. OVERLAND, BERKE, WESLEY, GITS, RANDOLPH & LEVANAS 2566 Overland Ave., 7th Floor Los Angeles CA 90064

- (BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Woodland Hills, California.

Executed on 11/17, 1986, at Woodland Hills, California.

- (BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee.

Executed on, 19, at, California.

- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

- (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

PAMELA J. RUCKER

Type or Print Name

Signature